

I. Interest Of Proposed Amici

Proposed *Amici* are associates of local law enforcement officials and individual current law enforcement officials. They have deep expertise in local law enforcement and, in addition, on cooperative federal-state law enforcement activities.

Major Cities Chiefs Police Association is a professional association of chiefs and sheriffs representing the largest cities in the United States, serving more than 68 million people. The Association has a substantial interest in the issues presented in this case, which bear on the ability of local law enforcement officers to effectively police communities that include immigrant populations.

Police Executive Research Forum is a national membership organization of police executives from the largest city, county and state law enforcement agencies dedicated to improving policing and advancing professionalism through research and involvement in public policy debate.

The following individuals are Chiefs of Police, Sheriffs, or Lieutenants of municipalities or counties with large immigrant communities:

- Chief Art Acevedo, City of Austin, Texas, Police Department;
- Chief Charlie Beck, Los Angeles, California, Police Department;
- Chief Richard S. Biehl, Dayton, Ohio, Police Department;
- Chief Chris Burbank, Salt Lake City, Utah, Police Department;
- Sheriff Mark C. Curran Jr., Lake County, Illinois, Sheriff's Office;
- Sheriff Tony Estrada, Santa Cruz County, Arizona, Sheriff's Office;
- Commissioner William B. Evans, Boston, Massachusetts, Police Department;
- Sheriff Adrian Garcia, Harris County, Texas, Sheriff's Office;

- Sheriff Marlin Gusman, New Orleans Parish, Louisiana, Sheriff's Office;
- Chief James Hawkins, Garden City, Kansas, Police Department;
- Chief Dwight Henninger, Vail, Colorado, Police Department;
- Chief Michael C. Koval, Madison, Wisconsin, Police Department;
- Chief Jose L. Lopez Sr., Durham, North Carolina, Police Department;
- Sheriff Leon Lott, Richland County, South Carolina, Sheriff's Department;
- Sheriff Bill McCarthy, Polk County, Iowa, Sheriff's Office;
- Chief Roy W. Minter, Jr., Peoria, Arizona, Police Department;
- Lieutenant Andy Norris, Tuscaloosa County, Alabama, Sheriff's Office;
- Chief Kathleen O'Toole, Seattle, Washington, Police Department;
- Commissioner Charles Ramsey, Philadelphia, Pennsylvania, Police Department
- Chief Greg Suhr, San Francisco, California, Police Department;
- Chief Ron Teachman, South Bend, Indiana, Police Department;
- Chief Michael Tupper, Marshalltown, Iowa, Police Department;
- Sheriff John Urquhart, King County, Washington, Sheriff's Office;
- Sheriff Lupe Valdez, Dallas County, Texas, Sheriff's Department;
- Chief Roberto Villaseñor, Tucson, Arizona, Police Department;
- Chief Robert White, Denver, Colorado, Police Department;
- Sheriff Richard D. Wiles, El Paso County, Texas, Sheriff's Office.¹

¹ For individuals, affiliations are provided for identification purposes only.

II. Proposed *Amici*'s Brief Is Useful To The Court

In their accompanying brief, proposed *amici* supplement Defendants' opposition to Plaintiffs' Motion for Preliminary Injunction by drawing on their knowledge and experiences with local law enforcement practices and effective policing. In particular, proposed *amici* explain that the deferred action initiative will improve public safety by encouraging community cooperation with police, an essential element to effective policing and improving public safety. Proposed *amici* also demonstrate that the deferred action initiative will provide individuals with the opportunity to obtain verified and secure identification, which aids law enforcement in carrying out its day to day duties. The information presented by proposed *amici* will aid the Court in assessing the balance of equities and the public interest put at issue by Plaintiffs' Motion for Preliminary Injunction.

III. Conclusion

Proposed *amici* respectfully request that this Court grant this motion, allow them to participate as *amici curiae*, and accept for filing the brief submitted with this motion.

Dated: January 12, 2015

Respectfully submitted,

/s/ Chirag G. Badlani

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CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing motion and proposed brief will be delivered electronically on January 12, 2015, to counsel for Plaintiffs and Defendants through the District's Electronic Case Filing system.

/s/ Chirag G. Badlani